

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196
Index No. 10-MD-2196 (JZ)

This document relates to:

Spring Air International LLC et al. v. Hickory
Springs Manufacturing Company et al.,
Case No. 1:11-pf-10001-JZ


**STIPULATION AND MOTION TO SUSPEND LITIGATION AGAINST DOMFOAM
INTERNATIONAL, INC. AND VALLE FOAM INDUSTRIES (1995) INC.**


Whereas, Plaintiffs Spring Air International LLC, Spring Air Ohio LLC, Spring Air LLC, E&E Bedding Company, Inc., and Alfred T. Giuliano, chapter 7 Trustee of the substantively consolidated estates of: Consolidated Bedding Inc.; Ackerman Manufacturing Company; Alabama Bedding Manufacturing Company, Inc.; American Bedding Industries, Inc.; Associated Trucking Company, Inc.; Atlas Bedding Manufacturing Corporation; Chattam & Wells, Inc.; Nature's Rest, Inc.; Nature's Rest Marketing, LLC; Spring Air Bedding Company; Spring Air California – Deluxe Bedding Company, Inc; Spring Air Partners – North America, Inc.; Spring Air Partners – Texas, Inc.; Spring Air West, LLC; and The Spring Air Company (individually and collectively, “Plaintiffs”) and Domfoam International, Inc. (“Domfoam”) and Valle Foam Industries (1995) Inc. (“Valle”) have entered into Settlement Agreements as of January 3, 2012 (the “Agreements”); and

Whereas, pursuant to the terms of the Agreements, the parties are to submit to this Court a joint request for an order suspending the litigation proceedings against Domfoam and Valle; and

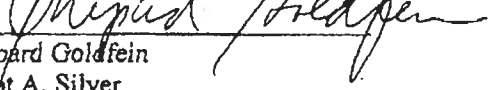
Whereas, subject to approval of this Court, the parties stipulate and request that this Court enter an Order suspending all proceedings as scheduled against Domfoam and Valle,

Dated: January 11, 2012

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*Counsel for Domfoam International, Inc., and
Valle Foam Industries (1995) Inc.*

IT IS SO ORDERED.

Dated: January __, 2012

JACK ZOUHARY
U.S. DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipts. Parties may access this filing through the Court's system.

/s/ Elliot A. Silver
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